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February 6, 1998

David Waddell
Executive Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

In Re: *BellSouth Telecommunications, Inc.'s Entry into
Long Distance (interLATA) Service in Tennessee
Pursuant to Section 271 of the Telecommunications
Act of 1996*

Docket No: 97-00309

Dear Mr. Waddell:

Please find enclosed the original and thirteen copies of
AT&T's Comments Concerning Conduct of Technical Workshop.

Sincerely,


Jim Lamoureux

cc: Parties of record

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In Re: BellSouth Telecommunications, Inc.'s)	
Entry into Long Distance (interLATA) Service in)	
Tennessee Pursuant to Section 271 of the)	Docket No. 97-00309
Telecommunications Act of 1996)	

**AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.'S
COMMENTS CONCERNING CONDUCT OF TECHNICAL WORKSHOPS**

Pursuant to the January 27, 1998, Report and Recommendation of Hearing Officer in this proceeding, which was adopted by the TRA on February 3, 1998, AT&T Communications of the South Central States, Inc. ("AT&T") hereby submits its Comments concerning the conduct of the two workshops that the TRA has scheduled in this proceeding. Specifically, the TRA has scheduled workshops on operations support systems ("OSS") and on performance measures. As the TRA is aware, these two issues are critical to an evaluation of BellSouth's Statement of Generally Available Terms ("SGAT") and BellSouth's compliance with the 14 point Competitive Checklist in Section 271 of the Telecommunications Act of 1996. Both of these issues will be discussed at length in the testimony and at the hearings in this proceeding.

Because of the critical role that each of these issues will play in this proceeding, AT&T believes that each of these workshops requires specific procedures to insure that the TRA obtains information in a manner that will allow it to reach a decision on BellSouth's request for approval of its SGAT and for the TRA to evaluate BellSouth's

compliance with the Competitive Checklist. Set forth below are AT&T's suggestions for the procedures the TRA should adopt for the conduct of the workshops.

I. THE OSS WORKSHOP

The OSS Workshop to be held on March 5-6, 1998 should be conducted as follows:

- a. No later than February 20, 1998, any interested party in this proceeding may provide to the TRA and the other parties a list identifying the deficiencies in the manner in which BellSouth intends to provide access to its OSS to Competitive Local Exchange Companies ("CLECs"). BellSouth shall provide its response to the deficiencies by February 27, 1998.
- b. At the workshop, BellSouth should be required to provide not only a demonstration of those systems BellSouth intends to make available to CLECs, but also of BellSouth's internal OSS and the manner in which BellSouth accesses its internal OSS. This will allow the TRA to compare the means of access available to CLECs and those available to BellSouth. Only by comparing the manner in which BellSouth accesses its OSS with the manner in which it intends to allow CLECs to access BellSouth's OSS can the TRA determine whether BellSouth's proposed means of access to its OSS are non-discriminatory. The demonstration of the manner in which BellSouth accesses its internal OSS may take place either at the TRA or at BellSouth's facilities, but must be a "live" demonstration, rather than a presentation. During this demonstration, parties should be permitted to ask questions of the BellSouth personnel involved in the demonstration.
- c. All activities conducted as part of the OSS workshop should be evidence. Witnesses should be sworn, and all discussion should be transcribed.
- d. All parties should be allowed to attend the workshop and permitted to ask questions. Lawyers, as well as non-lawyer technical experts, should be permitted to ask questions of BellSouth and its representatives.
- e. During the demonstration, CLECs should be allowed to request a particular service from BellSouth and furnish the informational inputs to be entered into the OSSs. By conducting the Workshop in the

above manner, the TRA will be assured that the OSS workshop provides information under circumstances as similar to those to be faced by CLECs as possible.

- f. At the conclusion of the demonstration, each CLEC should be permitted thirty minutes to provide the TRA with a summary of the deficiencies observed in the OSS. BellSouth should then be permitted 30 minutes to respond.

These procedures were recently used by the Alabama Public Service Commission as part of its 271 proceeding, and AT&T believes that the process provided invaluable information to the Alabama Public Service Commission to aid it in reaching its decision. AT&T also believes that this process will allow the TRA to gather as much information as possible in advance of the hearing in order to reach a decision on this issue.

II. THE PERFORMANCE MEASUREMENTS WORKSHOP

- a. No later than March 9, 1998, any interested party shall provide to the TRA and other parties the performance measures, administrative procedures and operational considerations appropriate for monitoring BellSouth's support of CLEC operations. Parties shall also identify the perceived deficiencies in BellSouth's proposal. BellSouth shall provide its response to the deficiencies by March 16, 1998.
- b. All activities conducted as part of the performance measures workshop should be evidence. Witnesses should be sworn, and all discussion should be transcribed.
- c. All parties should be allowed to attend the workshop and permitted to ask questions. Lawyers, as well as non-lawyer technical experts, should be permitted to ask questions of BellSouth and its representatives.
- d. At the workshop, each party shall be given one hour to provide a summary of the information filed on March 9, 1998 and/or March 16, 1998. That summary shall discuss any claimed deficiencies in BellSouth's proposed measures and the appropriateness of the measures and associated procedures the party is proposing.

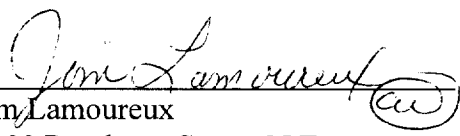
Following this, BellSouth shall have one hour to respond.
Questions shall be permitted during this part of the workshop.

- e. Each party shall then have fifteen minutes to provide a closing statement.

AT&T looks forward to participating in the workshops in this proceeding and believes that its proposed procedures shall make these workshops a useful tool for the TRA to obtain the factual information necessary to reaching a decision on these important issues.

Respectfully submitted,

**AT&T COMMUNICATIONS OF
THE SOUTH CENTRAL
STATES, INC.**



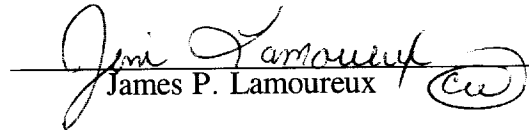
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Attorney for AT&T
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Dated: February 6, 1998

CERTIFICATE OF SERVICE

I, James P. Lamoureux, hereby certify that on this 6th day of February, 1998, a true and correct copy of the foregoing has been delivered via U. S. Mail, postage prepaid to the following counsel of record:


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